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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL WAYMO'S LETTER
BRIEF RE JACOBS-RELATED
DISCOVERY**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under
7 Seal confidential information in its Letter Brief Regarding Jacobs-Related Discovery ("Waymo's
8 Letter Brief"). Waymo's Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 9 to Waymo's Letter Brief	Entire Document	Defendants

11 3. The exhibit to Waymo's Letter Brief contains information that Defendants have
12 designated as confidential and/or highly confidential.

13 4. Waymo takes no position on the merits of sealing Defendants' designated material, and
14 expects Defendants to file one or more declarations in accordance with the Local Rules.

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is
16 true and correct, and that this declaration was executed in San Francisco, California, on December 12,
17 2017.

18 By /s/ Lindsay Cooper
19 Lindsay Cooper
20 Attorneys for WAYMO LLC

21
22 **SIGNATURE ATTESTATION**

23 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
24 filing of this document has been obtained from Lindsay Cooper.

25
26 /s/ Charles K. Verhoeven
27 Charles K. Verhoeven